**COMMISSIONERS** 

3 GARY PIERCE, Chairman **BOB STUMP** 

> SANDRA D. KENNEDY PAUL NEWMAN

**BRENDA BURNS** 

6

4

5

IN THE MATTER OF THE REVIEW AND POSSIBLE REVISION OF ARIZONA UNIVERSAL SERVICE FUND RULES, ARTICLE 12 OF THE ARIZONA ADMINISTRATIVE CODE.

8

7

Docket No. RT-00000H-97-0137

9

IN THE MATTER OF THE INVESTIGATION OF THE COST OF TELECOMMUNICATIONS ACCESS.

Docket No. T-00000D-00-0672

10

11

GALLAGHER & KENNEDY, P.A 2575 E. CAMELBACK ROAD PHOENIX, ARIZONA 85016-9225 (602) 530-8000

12

13

14

15

16

17

18

20

21

22

23

24

### **COMMENTS OF AT&T** IN RESPONSE TO MARCH 20, 2012 PROCEDURAL ORDER

Michael M. Grant GALLAGHER & KENNEDY, P.A. 2575 East Camelback Road Phoenix, Arizona 85016-9225 Demetrios G. Metropoulos MAYER BROWN LLP 71 South Wacker Drive Chicago, Illinois 60606

Attorneys for AT&T Communications of the Mountain States, Inc. and TCG Phoenix **Gregory Castle** AT&T SERVICES, INC. 525 Market Street, Room 2022 San Francisco, California 94105

> Arizona Corporation Commission DOCKETE

> > MAY 1 5 2012

DOCKETED BY



## TABLE OF CONTENTS

2					<u>Page</u>
3	I.	INTR	ODU	CTION	1
4	II.			ON AND RESPONSE TO SPECIFIC QUESTIONS POSED BY ION	6
5		1.	wha	ght of the <i>CAF Order</i> , is there a need for the Commission to determine t carriers should be covered by access reform, or a target level for intrastate	
6			that	ess charges? Does the <i>CAF Order</i> address all access charge rate elements have been addressed in these dockets? If not, should the Commission take	
7			Com	on with respect to these rate elements? Does it make sense for the armission to act on access charge reform while the <i>CAF Order</i> is on appeal, while the FCC continues to consider comments on the Order?	6
8		2.	Do a	any parties wish to modify or augment their recommendations concerning ess charge reform in light of the FCC's actions?	
9		2		en the <i>CAF Order</i> , does the Commission need to establish procedures to	/
10		3.	impl	lement intrastate access reform? And, if yes, what procedures are mmended?	8
11				Require Early Filing of Access Data.	
12			В.	Allow for Dispute Resolution	
13		4.	whet	en the <i>CAF Order</i> , does there remain a need to address the question of ther carriers should be permitted to contract for access rates that differ from a tariffed rates? If there is still a need, is the current record sufficient to	
14				lve the issue?	13
15 16		5.	revis	s the <i>CAF Order</i> impact the AUSF? Should the Commission proceed with sions to the AUSF rules? Why or why not? How should the AUSF be sed? Is the current record sufficient to support any revised recommended	
10				rms?	13
17		6.	•	ght of the intervening events, do the interested parties have modifications by of their earlier recommendations about the AUSF not already addressed?	
18			Proc	cedurally, how should the Commission consider any revised	
19		7.		here any reason why the Commission should not act now concerning	1
20		,.		ralized administration and automatic enrollment of Lifeline and Link-up?	15
21		8.	of th	ght of the <i>CAF Order</i> 's reference to the role of states in the implementation ne reforms addressed in that Order, should the Commission take further on in these dockets? If yes, what?	
22		9.		current rate case procedures adequate or should the Commission establish	1 3
23		7.	proc	edures for rate of return carriers that are not able to absorb lost access ge revenues?	15

24 | 17840-11/3042678

i

1 2	ar	hould the Commission seek carrier-specific information about the nticipated impact of the FCC's <i>CAF Order</i> on carrier revenues? If yes, om all carriers, or, e.g., only from rate of return carriers?17
3	11. A	re there any other issues that can or should be addressed in these dockets?  Yes, how should they be addressed procedurally?
4	III. CONCLI	USION18
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		

### I. INTRODUCTION

This Commission recognized the need for access charge reform, and the substantial benefits that reform will bring Arizona consumers, long before the FCC issued its November 18, 2011 order reforming the national intercarrier compensation system. Over a decade ago, the Commission stated its goal was to reduce the switched access rates that local exchange carriers ("LECs") charge for in-state calls to parity with the rates those LECs charge for performing the same functions on interstate calls.<sup>1</sup>

AT&T's recommendation throughout the present proceeding has been simple: the Commission should carry out the objective of access parity it set years ago. After three years of workshops and evidentiary proceedings, the overwhelming weight of the evidence showed that this modest step towards reform would be meaningful and easy to achieve. And just about every party to this proceeding agreed that access reform is both necessary and beneficial.<sup>2</sup>

The Commission has now asked the parties to comment on what steps it should take in light of the FCC's CAF Order.<sup>3</sup> AT&T addresses the Commission's specific questions below. The short answer, though, is that the FCC's order puts an end to any further arguments about delay or exceptions. It correctly held that the present access charge regime is outdated and harmful to consumers and that reform is necessary for all carriers' access charges. The FCC has unequivocally stated that all access rates will move to a bill-and-keep framework and for terminating access charges the FCC has set a uniform, nationwide schedule for bringing rates to that bill-and-keep end state. Just as this Commission anticipated over a decade ago, and just as

Decision No. 63487, p. 12 and Attachment A, p. 2.

<sup>&</sup>lt;sup>2</sup> Staff observed in its opening brief that "most all parties agree that the Commission should undertake access reform at this time." Staff Br. at 1.

<sup>&</sup>lt;sup>3</sup> In re Connect America Fund: A National Broadband Plan For Our Future, 54 Communications Reg. (P&F) 637, 2011 WL 5844975 (FCC rel. Nov. 18, 2011) ("CAF Order").

AT&T advocated in this proceeding, the FCC has established parity as the first phase of access reform. All carriers must go halfway to parity for terminating access on July 1 of this year and they must implement full parity on the terminating side by July 1, 2013.

But, as the March 2012 Procedural Order recognizes, "even if the FCC's mandate to reduce, and eventually eliminate, intrastate access charges survives challenge, it appears that there may still be issues raised in this proceeding that need to be resolved by the Commission." While the FCC has established detailed rules for terminating access reform, and established federal mechanisms to help carriers recover the resulting reductions in access revenue, the FCC has also explicitly recognized that state commissions will "play a critical role implementing and enforcing intercarrier compensation reforms."

Below, AT&T responds to each of the Commission's specific questions regarding the impact of the FCC's order. Briefly, there are two main points.

First, the FCC directed state commissions to "oversee changes to intrastate access tariffs to ensure that modifications to intrastate tariffs are consistent with the framework and rules we adopt today." The first wave of intrastate tariff changes is already at hand: all carriers must implement tariff reductions to bring their intrastate terminating switched access rates halfway to parity on July 1 of this year.

But, because the various LECs' intrastate access rate structures may differ substantially from the rate structures in their interstate tariffs, going halfway to parity is just not a simple arithmetical exercise of splitting the difference. Rather, this first step involves a rather detailed calculation, in which each LEC computes (i) the access revenues from applying its intrastate

Procedural Order, p. 4, ll. 18-20.

<sup>&</sup>lt;sup>5</sup> CAF Order, ¶ 813.

<sup>&</sup>lt;sup>6</sup> *Id.* ¶ 803.

rates to intrastate volumes for a base period and (ii) the access revenues that result from applying its interstate rates to those base period intrastate volumes.<sup>7</sup> The LEC must then propose intrastate tariff changes that would yield revenues halfway between the intrastate and interstate calculations.

Unless these calculations are fully disclosed and vetted, LECs have an obvious opportunity to "hide the ball" by implementing tariff changes that look substantial on the surface, but do not really comply with the FCC's rules. Thus, the FCC emphasized "state oversight of the transition process is necessary to ensure that carriers comply with the transition timing and intrastate access charge reductions" required in the FCC's order. The FCC specifically urged state commissions "to ensure carriers are not taking actions that could enable a windfall and/or double recovery" and to guard against other "unanticipated types of gamesmanship." The FCC has facilitated the supervisory process by issuing spreadsheets to the industry that lay out how the FCC expects carriers to perform the calculations. Copies of the FCC spreadsheets (redacting other matters not relevant to the switched access calculations pertinent here) are provided as **Attachment A** hereto; unredacted versions are presented for reference at **Attachment B**.

Without such data, the Commission won't be able to assure compliance by simply looking at the tariff changes alone. Thus, in order to make it easier for the Commission, its Staff and interested parties to ensure the July 1 access reductions being implemented in Arizona meet the requirements of the *CAF Order*, the Commission (or Staff in its tariff review process) should require all carriers providing intrastate access services in Arizona to provide key data (using the FCC's spreadsheets) in advance of the July 1, 2012 effective date. AT&T would suggest the

<sup>&</sup>lt;sup>7</sup> 47 C.F.R. §§ 51.907(b), 51.909(b).

<sup>&</sup>lt;sup>8</sup> CAF Order, ¶ 813.

<sup>23 9 10</sup> 

1

4

5

6 7

8

10

11

12 13

14

15 16

17

18

19

20 21

24

22

23

tariff(s) and information be provided no later than June 1, 2012 to ensure ample time for review

and clarification. The specific data needed are described and explained in response to Question

Number 3 below.

Requiring carriers to provide this information in advance of the actual effective date of the tariffs will save the Commission's resources and help prevent the unnecessary filing of complaints after July 1. Because the FCC has ordered a July 1, 2012 effective date for the terminating access tariff adjustments, the June 1 filing date is fully consistent with A.R.S. § 40-367, which specifies a 30-day advance filing and notice requirement to the Commission and public for carriers' changes in their tariffs and rates. The Commission will also put itself, the Staff and the carriers in a better position to review new access rates, get clarification regarding the data, if necessary, and work to resolve any concerns before the new rates take effect.

**Second,** while the proper implementation of FCC-ordered terminating access reductions is imminent, the FCC's order also leaves states free to address and implement reforms on the originating access side. The FCC stated that "[t]o the extent that states have established rate reduction transitions for rate elements not reduced in this Order, nothing in this Order impacts such transitions." Indeed, the FCC made clear that its order does not "prevent states from reducing rates on a faster transition provided that states provide any additional recovery support that may be needed." Thus, the FCC's CAF Order does not preclude, and in fact invites, the Commission to implement the reforms to intrastate originating access charges that have already been proposed in this proceeding.

<sup>10</sup> *Id.* ¶ 816 n.1542. <sup>11</sup> *Id.* 

Moreover, the need to reduce originating access charges is even more clear in the wake of the FCC's CAF Order. Although the FCC has not itself adopted specific reductions to originating access charges at this time, it did "find that originating charges should ultimately be subject to the bill-and-keep framework" and that the legal framework of the FCC's order "is inconsistent with permanent retention of originating access charges." Further, the FCC's order makes it easier to implement reductions to intrastate originating access. This Commission need not worry about offsetting the FCC's reductions to terminating access rates in a revenue neutral fashion, because the FCC has already taken care of that through federal recovery mechanisms for the reductions required in the CAF Order. The FCC's express purposes were to "free states from potentially significant financial burdens" and to protect consumers in "early adopter" states from large federally-driven rate increases. With these federal protections in place, the Commission can implement meaningful reform (and achieve its long-stated goal of access parity) on the originating access side, with much less of an impact on retail rates than would have been seen if it had to address the recovery of access reductions on both originating and terminating access.

Because the first *terminating* access reductions are nearly at hand, and because the Commission plays a critical role in making sure those reductions are properly implemented, the Commission should first focus on the implementation of the first stage of terminating access reform. Once that first step is complete, however, the Commission should direct the parties to address the subject of originating access reform.

<sup>12</sup> *Id.* ¶ 817. <sup>13</sup> *Id.* ¶ 795.

## II. DISCUSSION AND RESPONSE TO SPECIFIC QUESTIONS POSED BY COMMISSION

1. In light of the CAF Order, is there a need for the Commission to determine what carriers should be covered by access reform, or a target level for intrastate access charges? Does the CAF Order address all access charge rate elements that have been addressed in these dockets? If not, should the Commission take action with respect to these rate elements? Does it make sense for the Commission to act on access charge reform while the CAF Order is on appeal, or while the FCC continues to consider comments on the Order?

With respect to terminating access, there is no need to determine what carriers should be covered by access reform or what target their access charges should meet. The FCC has decided that all LECs should be covered (with slightly different transition plans for rate-of-return and price-cap carriers). It has set forth a detailed multi-year transition plan with mandatory targets for each year. The Commission's role – and we underscore that it is a vitally important one – is to ensure that all Arizona LECs comply with the FCC-mandated reforms. As the first stage of terminating access reductions is just about to get underway, the Commission and Staff should ensure that all LECs provide the information underlying their proposed implementing tariffs, so both Staff and the parties have the opportunity to vet the calculations and resolve disagreements, hopefully without the need for complaint proceedings. *See* answer to Question Number 3 below.

While the FCC's terminating access reforms will bring benefits to Arizona consumers and the competitive marketplace, the *CAF Order* does not address all the access charge rate elements that have been addressed in these dockets. In particular, the FCC has not set a national timetable for reducing originating access rates, although it has established a bill-and-keep framework as the ultimate goal.<sup>14</sup> While the FCC requested and received comments on the

<sup>&</sup>lt;sup>14</sup> CAF Order, ¶ 817.

23 15 Id. ¶ 816 n.1542.

specifics of federal reforms, it left states free to take action on originating access elements in the interim.<sup>15</sup>

Further, because the FCC has taken care of recovery mechanisms to support terminating access reform, the Commission can implement originating access reforms at the state level with *substantially less* impact on retail rates. The Commission should not let this golden opportunity pass and it should accept the FCC's invitation to act on originating access. Thus, once the implementation of the July 2012 phase of terminating access reductions is complete, the Commission should ask the parties to submit brief comments regarding originating access reform.

The pending appeals of the *CAF Order* are even more reason to act on originating access now. If the *CAF Order*'s reductions to terminating switched access rates are upheld on appeal – and AT&T believes they will be upheld – the FCC's actions have made it easier for the Commission to implement originating access reform now. In the unlikely event those terminating access portions of the *CAF Order* are overturned, there is no question that this Commission still has jurisdiction to implement its own intrastate access reforms and it should ensure that Arizona consumers receive meaningful relief.

# 2. Do any parties wish to modify or augment their recommendations concerning access charge reform in light of the FCC's actions?

With respect to terminating access, given the current state of the law, AT&T withdraws for now its previous recommendations, because the FCC has given Arizona consumers the meaningful relief that AT&T sought in this proceeding. AT&T's only remaining recommendation for terminating access at this time is that the Commission (or the ALJ or its

<sup>16</sup> CAF Order, ¶ 813.

Staff) promptly direct carriers to produce the necessary data to ensure that they properly comply with the first phase of FCC-ordered access reductions, which the FCC has mandated for July 1, 2012. See answer to Ouestion Number 3 below.

On the originating access side, AT&T maintains that its recommendation of reducing originating intrastate access rates for all LECs to parity with the corresponding interstate rates (the goal the Commission established for all intrastate access rates) is just as beneficial to Arizona consumers and even easier for the Commission to achieve. The Commission should accordingly request comments on originating access issues after the July 2012 terminating access reductions have been implemented.

3. Given the CAF Order, does the Commission need to establish procedures to implement intrastate access reform? And, if yes, what procedures are recommended?

Yes, the Commission does need to establish procedures to implement intrastate access reform. On terminating access, the FCC has charted the course, but the Commission must remain at the helm to ensure that Arizona LECs follow the FCC's direction and to ensure consumers receive the full benefit of the FCC-mandated reform. Time is of the essence. The first phase of FCC-mandated reductions will begin July 1, 2012 – only six weeks from now – and the calculation of the necessary tariff changes will not be transparent or simple for many Arizona LECs.

The FCC emphasized that "state oversight of the transition process is necessary to ensure that carriers comply with the transition timing and intrastate access charge reductions" required in the Order. <sup>16</sup> Because rates for intrastate access traffic will remain in intrastate tariffs under the *CAF Order*, the Commission will have to "monitor compliance with [the] rate transition; review

8

resolution.

Α.

demand level. 19

10

12

11

13

14

15

17

16

18

19 20

21

23

22 | 17

how carriers reduce rates to ensure consistency with the uniform framework; and guard against

attempts to raise capped intercarrier compensation rates, as well as unanticipated types of

gamesmanship."<sup>17</sup> In this regard, the Commission should make sure that "carriers are not taking

actions that could enable a windfall and/or double recovery." To help the Commission fulfill

its important role in an efficient and effective manner, AT&T recommends that the Commission

(A) require early filing of access data and (B) expressly permit parties to engage in dispute

intrastate terminating access rates that all carriers must put into effect as of July 1, 2012 are not

simple or straightforward percentage reductions in rates. Rather, the rules promulgated by the

FCC establish a more involved process under which all LECs establish new rates to reflect a 50

percent reduction in the revenues generated by their interstate and intrastate rates at a specified

rate elements and rate structure and FY 2011 usage levels. The rules vest the LECs with a

certain degree of discretion in determining the final intrastate rates that will implement the

required revenue reduction. How a carrier implements those calculations – and more to the

point, whether it does so properly – may not be readily apparent from the face of the tariff, which

might otherwise only show the final rates the carrier proposes to charge.

These calculations necessarily involve a set of variables, such as interstate and intrastate

Require Early Filing of Access Data. As we noted earlier, the reductions in

In addition, the Commission retains oversight of interconnection agreement negotiations and arbitrations to the extent carriers seek to implement the access charge reductions through such agreements. *Id.*19 See 47 C.F.R. §§ 51.907, 51.909, 51.911.

<sup>20</sup> Fiscal Year 2011 means October 1, 2010 through September 30, 2011. 47 C.F.R. § 51.903.

<sup>21</sup> 47 C.F.R. §§ 51.907(b)(2), 51.909(b)(2), 51.911(b).

Thus, to facilitate review by the Commission, Staff and interested parties, as well as to meet statutory requirements, all carriers should provide key data with their proposed tariffs no later than June 1, 2012 to ensure time for review and clarification. Carriers should use the spreadsheets provided by the FCC (see Attachments A and B hereto). The specific information to be filed should include the following data points:

- 1. Fiscal Year 2011<sup>20</sup> intrastate demand for each rate element included in "Transitional Intrastate Access Service" as that term is defined in 47 C.F.R. § 51.903(j).
  - 2. All intrastate access rates in effect as of December 29, 2011.
  - 3. All interstate access rates in effect as of December 29, 2011.
- 4. If the carrier's intrastate rate structure and the interstate rate structure are not the same, the carrier should provide an explanation showing how Fiscal Year 2011 intrastate demand for Transitional Intrastate Access Service mapped into the interstate rate structure to determine the interstate revenues used in the FCC-mandated revenue reduction calculations.<sup>21</sup>
- 5. A full description of the methodology the carrier will use to set revised rates to reflect the calculated revenue reduction.<sup>22</sup>
- 6. A full description of the rate structure the carrier will opt to utilize as of July 1, 2012, as appropriate under 47 C.F.R. §§ 51.907 (price cap carriers), 51.909 (rate-of-return carriers), and 51.911 (CLECs).

The first three data points are self-explanatory, as they serve as the foundation for the revenue calculations the LECs are required to undertake. The remaining three points are important, because in many (if not most) cases, carriers' interstate and intrastate rate structures

<sup>&</sup>lt;sup>22</sup> See 47 C.F.R. §§ 51.907(b)(2)(iv) and (v), 51.909(b)(2)(iv) and (v).

and elements do not precisely align. Thus, the "mapping" required under data point 4 ensures, for example, that a LEC is not inappropriately assigning a disproportionate amount of intrastate usage to a high interstate rate element that, in fact, has little or no usage or that the LEC is not "mapping" its intrastate demand into its interstate rates in a manner that fails to reflect how the LEC would have charged carriers had the usage, in fact, been interstate. Such practices, if left unchecked, could result in a higher interstate revenue figure, which, in turn, would result in a lower total revenue reduction when interstate revenues are subtracted from intrastate revenues.

Similarly, data point 5 requires the LEC to explain how it translated the properly calculated revenue difference into new intrastate rates. As with the information discussed in data point 4, this information is necessary to deter carriers from making cosmetic rate reductions to intrastate rate elements that have little or no usage associated with them, while leaving the rate elements with higher demand relatively unchanged.

Finally, the information sought in data point 6 reflects the choice a LEC with divergent interstate and intrastate rate structures is required to make with its July 1, 2012 rates. In the second phase of the FCC-ordered reforms, which will be effective July 1, 2013, any carrier that has different rate structures for intrastate and interstate switched access service will be required to adopt a common structure based on its interstate configuration.<sup>23</sup> In the upcoming first set of reductions, however, a carrier may elect to modify its rates using its intrastate access rate structure or it may elect to apply its interstate access rate structure and interstate rates.<sup>24</sup> In the latter case, the carrier will be entitled to assess a transitional per-minute charge based on end office switching minutes. Given that, the LECs should be required to (1) specify the election

<sup>&</sup>lt;sup>23</sup> See 47 C.F.R. 88 51 907(c), 51,909(c),

<sup>&</sup>lt;sup>24</sup> See 47 C.F.R. § 51.907(b)(2)(iv) and (v) for price cap carriers; 47 C.F.R. § 51.909(b)(2)(iv) and (v) for rate-of-return carriers; and 47 C.F.R. § 51.911(b)(4) and (5) for CLECs.

they are making under these provisions and (2) if a carrier elects to apply its interstate rate structure and rates, demonstrate how the transitional charge was calculated and applied.<sup>25</sup>

Requiring carriers to provide this information with proposed tariffs, in advance of the effective date of the tariffs, will assist and streamline Staff's review and help prevent or limit the filing of complaints.

B. Allow for Dispute Resolution. Given the large number of filings to be made, there is always the possibility of disputes regarding whether rates have been calculated correctly. AT&T will carefully review all carriers' intrastate switched access tariffs (and underlying supporting data pursuant to the terms of the Protective Order entered in this case) and attempt to negotiate with any carriers that improperly reflect the FCC's requirements in an effort to resolve a dispute without the need for Commission action. To facilitate such informal procedures, AT&T requests that the ALJ issue a procedural order confirming that the existing Protective Order in this case will permit all interested stakeholders that execute or have executed the appropriate confidentiality agreement to have access to the completed data templates that the carriers are required to submit on June 1 in their individual dockets. Carriers should also be instructed to provide electronic copies of the proposed tariffs and supporting templates to such stakeholders. If voluntary negotiations are unsuccessful, some complaints could be brought to the Commission, but a voluntary process could resolve or at least narrow disputes without the need for litigation.<sup>26</sup>

The new FCC rules, in fact, require carriers electing to establish new intrastate rates in this manner to "notify the appropriate state regulatory authority of their election" in the new tariff filings. 47 C.F.R. § 51.907(b)(2)(v), 47 C.F.R. § 51.909(b)(2)(v).

With respect to disputes that may arise in the context of interconnection agreements, the parties should be required to avail themselves of the dispute resolution provisions in those agreements.

2 | co 3 | le 4 | co 5 | C 6 | ha 7 | C

1

9

10

11

13

12

14

15

1617

18

19 20

21

22

23

<sup>27</sup> CAF Order, ¶ 739.

24 | 17840-11/3042678

Of course, if informal dispute resolution is unsuccessful and a dispute does lead to formal complaint proceedings, the Commission should not suspend the relevant tariffs. That would leave the pre-CAF Order rates, which the FCC has found to be unreasonable and harmful to consumers, in place. Carriers that file deficient tariffs should not be rewarded and the Commission should not permit them to continue charging the old, excessive, unlawful and harmful rates while the Commission assesses their proposed tariff changes. Instead, the Commission should leave the proposed tariff changes in effect as interim rates subject to true-up as of the required July 1, 2012 effective date.

4. Given the CAF Order, does there remain a need to address the question of whether carriers should be permitted to contract for access rates that differ from their tariffed rates? If there is still a need, is the current record sufficient to resolve the issue?

As to terminating access, the FCC has decided that its transition plan "sets a default framework, leaving carriers free to enter into negotiated agreements that allow for different terms." There is no need for the Commission to address the question of whether negotiated agreements should be permitted, because the FCC has already resolved that question.

5. Does the CAF Order impact the AUSF? Should the Commission proceed with revisions to the AUSF rules? Why or why not? How should the AUSF be revised? Is the current record sufficient to support any revised recommended reforms?

The *CAF Order* itself does not impact the AUSF. The FCC established two federal recovery mechanisms to address the mandated reductions in terminating access rates: the Access Recovery Charge ("ARC") and the Connect America Fund ("CAF"). Both mechanisms are

administered at the federal level. The FCC established these mechanisms precisely to avoid placing the burden of terminating access recovery on the states.<sup>28</sup>

With respect to originating access reform, the Commission can address the possibility of recovery through the AUSF at the same time that it decides whether, and by how much, originating access rates should be reduced – after implementation of the FCC-ordered first phase of terminating access reductions on July 1, 2012. At this time, however, one thing is already clear. Because the FCC has shouldered the burden of access recovery for *terminating* access reforms at the federal level, the Commission can reduce the LECs' intrastate *originating* access rates to parity with the corresponding interstate rates with significantly less burden on the AUSF. Indeed, the evidence may show that no AUSF support is needed for this modest but meaningful reform.

6. In light of the intervening events, do the interested parties have modifications to any of their earlier recommendations about the AUSF not already addressed? Procedurally, how should the Commission consider any revised recommendations?

Based on the current state of the law, AT&T does not have any modifications to its earlier recommendations about the AUSF. In particular, AT&T continues to urge that the Commission expand the base of providers and revenues that contribute to the Fund and replace the present two-tiered contribution structure with a single contribution method that applies equally to all providers on a competitively neutral basis. As discussed under Question Number 5, however, the Commission need not and should not address AUSF recommendations until after the parties have implemented the FCC-ordered reductions in terminating access charges effective July 1, 2012. The imminent reforms on the terminating access side should take first priority and there is no need to address the AUSF in connection with those reforms, because

<sup>&</sup>lt;sup>28</sup> *Id.* ¶ 795.

the FCC has already established federal mechanisms for the recovery of access revenues on the terminating access side.

7. Is there any reason why the Commission should not act now concerning centralized administration and automatic enrollment of Lifeline and Link-up?

AT&T has filed comments with the FCC regarding the Lifeline program (Docket No. 11-42) and, specifically, on issues such as the need to establish a centralized national Lifeline eligibility database. To the extent other parties offer specific proposals on this subject, AT&T reserves the right to respond in its reply comments.

8. In light of the CAF Order's reference to the role of states in the implementation of the reforms addressed in that Order, should the Commission take further action in these dockets? If yes, what?

The Commission should take further action. As discussed above, on the terminating access side, the Commission should require all Arizona LECs to provide the supporting information necessary to verify that they will comply with the FCC-ordered reductions effective July 1, 2012. After those terminating access reductions have been implemented, the Commission should direct the parties to address the need for reforms of originating access.

9. Are current rate case procedures adequate or should the Commission establish procedures for rate of return carriers that are not able to absorb lost access charge revenues?

With respect to terminating access, the Commission need not establish procedures for rate of return carriers to obtain recovery of lost access charge revenues resulting from the FCC-ordered reductions. As discussed, the FCC has already established federal recovery mechanisms to address the terminating access reductions it has ordered. These federal recovery mechanisms also recognize the historical downward trend in access revenues. As the FCC stated, even if it had done nothing, "price cap and rate-of-return carriers alike" would "face an increasingly

unpredictable [access] revenue stream" and the downward trend of the recent years "will only get worse as demand for traditional telephone service continues to decline." Accordingly, the FCC explicitly rejected a 100 percent revenue-neutral approach to recovery, concluding that the reforms it adopted allowed incumbent LECs to earn a reasonable return on their investment.<sup>30</sup>

If an Arizona incumbent LEC takes advantage of the federal recovery mechanisms, it cannot complain to this Commission that the recovery does not give them a 100 percent guarantee of maintaining today's revenues – and, in any event, the Commission cannot override the FCC's mechanisms or give carriers a windfall or double recovery above that specified by the FCC. <sup>31</sup> If the FCC had not stepped in to reform the irretrievably broken access charge system, customer demand and access revenues would have declined anyway. Conversely, if a LEC chooses not to take advantage of the federal mechanisms for recovery of terminating access reductions (perhaps because it does not wish to comply with the limitations and conditions the FCC placed on recovery), that is a business choice the LEC is free to make. But, the Commission need not allow carriers to eschew the available federal recovery mechanisms and, instead, obtain recovery under some alternative Arizona state mechanism. Of course, the Commission may give rate-of-return LECs additional flexibility in retail pricing to reflect the competitive market that LECs face today and the fact that rate of return regulation, in almost all instances, is obsolete.

On the originating access side, the Commission should permit parties to address recovery issues in their comments following implementation of the FCC-ordered reductions in intrastate

<sup>&</sup>lt;sup>29</sup> CAF Order, ¶ 848.

 $<sup>^{30}</sup>$  Id. ¶ 924. Carriers who do not believe that the recovery mechanisms are sufficient may petition the FCC to rebut this presumption through a "Total Cost and Earnings Review." Id. ¶¶ 924-927. Obviously, the Arizona incumbent LECs should be required to exhaust that process before seeking some windfall relief from this Commission.  $^{31}$  Id. ¶ 813.

terminating access rates effective July 1, 2012. However, AT&T maintains (as in previous comments) that the Commission need not delay reform further by first moving to formal rate cases for all carriers. In this proceeding, this Commission can and should make a policy decision to require each LEC to conform its intrastate originating access rates to parity with its corresponding interstate rates. To the extent any carrier believes it deserves different treatment, it may choose not to comply with the Commission's order and then put on its case in the ensuing "show cause" proceeding brought by Staff.

10. Should the Commission seek carrier-specific information about the anticipated impact of the FCC's *CAF Order* on carrier revenues? If yes, from all carriers, or, e.g., only from rate of return carriers?

As explained in response to Question Number 3, the Commission should direct *all* LECs to provide carrier-specific information underlying their implementation of the FCC-ordered terminating access reductions effective July 1, 2012. While the primary purpose of that information is to fulfill this Commission's responsibility to ensure that the reductions are implemented properly, that information will also allow the Commission to assess the impact of the *CAF Order* on carrier revenues. The same information will also be useful in assessing the benefits of (and ease of implementing) originating access reforms, which the FCC has given states freedom to address.

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
11 12	
13	
14	

11. Are there any other issues that can or should be addressed in these dockets? If yes, how should they be addressed procedurally?

AT&T does not have any other issues to raise at this time, other than those discussed above. To the extent other parties seek to raise additional issues, AT&T will respond in its reply comments.

#### III. CONCLUSION

For the reasons set forth above, the Administrative Law Judge should issue a procedural order:

- (1) Directing LECs to provide in their respective dockets, by June 1, 2012, the tariff(s) and supporting information described in response to Question Number 3, so the Commission, its Staff and interested parties can verify the LECs' compliance with the FCC-ordered reductions in intrastate terminating access charges that will be effective July 1, 2012;
- (2) Extending the terms of the existing Protective Order in this case to protect any confidential data provided with the tariff(s) filed by carriers on terminating access;
- (3) Instructing carriers to provide electronic copies of proposed tariff(s) and supporting data to Staff and the parties to this docket at the time of filing with the Commission; and
- (4) After the July 2012 terminating access reductions are complete, soliciting comments from all parties on their proposals for originating access reforms.

22

21

15

16

17

18

19

20

23

RESPECTFULLY SUBMITTED this 1	.5 <sup>th</sup> day of May, 2012.
-------------------------------	------------------------------------

GALLAGHER & KENNEDY, P.A.

By VVUCTOU

2575 East Camelback Road Phoenix, Arizona 85016-9225

Attorneys for AT&T Communications of the Mountain States, Inc. and TCG Phoenix

Original and 13 copies filed this 15<sup>th</sup> day of May, 2012, with:

9 Docket Control

1

2

3

4

5

6

7

8

10

Arizona Corporation Commission 1200 West Washington Street

11 Phoenix, Arizona 85007

Copies of the foregoing mailed this 15<sup>th</sup> day of May, 2012, to:

Jane L. Rodda

14 Administrative Law Judge

**Hearing Division** 

15 Arizona Corporation Commission 400 West Congress

16 Tucson, Arizona 85701-1347

17 Craig A. Marks

Craig A. Marks, PLC

18 | 10645 North Tatum Boulevard, Suite 200-676

Phoenix, Arizona 85028

Thomas W. Bade, President

Arizona Dialtone, Inc.

6115 South Kyrene Road, #103

21 Chandler, Arizona 85283

Gary Joseph

National Brands, Inc. d/b/a Sharenet Communications

4633 West Polk Street

Phoenix, Arizona 85043

Curt Huttsell

Frontier Communications

1387 West 2250 South

Woods Cross, Utah 84087

Joan S. Burke

Law Office of Joan S. Burke 1650 North First Avenue

Phoenix, Arizona 85003

22

19

20

23

2 3	Nathan Glazier, Regional Manager Alltel Communications, Inc. 4805 East Thistle Landing Drive Phoenix, Arizona 85044	Michael W. Patten Roshka DeWulf & Patten, PLC One Arizona Center 400 East Van Buren Street, Suite 800 Phoenix, Arizona 85004
4	Mark A. DiNunzio	Dennis D. Ahlers
5	Cox Arizona Telcom, LLC MS DV3-16, Bldg. C	Associate General Counsel Integra Telecom, Inc./Eschelon
6	1550 West Deer Valley Road Phoenix, Arizona 85027	Telecom, Inc./Electric Lightwave, Inc. Advanced TelCom Group
7	Thocha, Alizona 05027	6160 Golden Hills Drive Golden Valley, Minnesota 55416
8	Lyndall Nipps	Charles H. Carrathers, III
9	Vice President, Regulatory Time Warner Telecom	General Counsel, South Central Region Verizon, Inc.
10	845 Camino Sur	HQE03H52
	Palm Springs, California 92262	600 Hidden Ridge Irving, Texas 75015-2092
11	Michael Hallam	Norman G. Curtright
12	Lewis and Roca, LLP	Qwest Corporation
13	40 North Central Avenue Phoenix, Arizona 85004	20 East Thomas Road, 16 <sup>th</sup> Floor Phoenix, Arizona 85012
14	Paul Castaneda	Stephen H. Kukta
15	President, Local 7019	Director and Counsel
13	Communication Workers of America 11070 North 24 <sup>th</sup> Avenue	Sprint Nextel 201 Mission Street, Suite 1500
16	Phoenix, Arizona 85029	San Francisco, California 94105
17	Maureen Scott	Karen E. Nally
18	Legal Division Arizona Corporation Commission	Law Office of Karen E. Nally, PLLC 3420 East Shea Boulevard, Suite 200
19	1200 West Washington Street Phoenix, Arizona 85007	Phoenix, Arizona 85028
20	Brad VanLeur, President	Michelle Wood
21	OrbitCom, Inc. 1701 North Louise Avenue	Residential Utility Consumer Office 1110 West Washington Street, Suite 220
	Sioux Falls, South Dakota 57107	Phoenix, Arizona 85007
22		

24 | 17840-11/3042678

1	Will Shand
2	Utilities Division Arizona Corporation Commission
3	1200 West Washington Street Phoenix, Arizona 85007
4	Rex Knowles
5	Executive Director – Regulatory XO Communications
6	7050 Union Park Avenue, Suite 400 Midvale, Utah 84047
7	Scott S. Wakefield
8	Ridenour, Hienton & Lewis, P.L.L.C. 201 North Central Avenue, Suite 3300 Phoenix, Arizona 85004-1052
9	Thochix, Arizona 63004-1032
10	Die Dearsell
11	16300   230000
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	

Armando Fimbres Utilities Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

Terri Ford Utilities Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

	ŀ										}				
Processed   Proc	1	A Inc Date:	8	Ü	٩	_ E	٤	9	I	1	-	*	_	M N O P Q R	S
Second Color	2 € 4 E E 8	ling Entity: ansmittal Nu YSA:	amber:												
Sam of Col. 8   P. F. 2011   Sam of Col. 8   P. F. 2011	2 0														
Sum of Col. is   Private	7 0	stal FY 2011 s	Actual Revenue	e for Transi	Honel Intrestate Access Service Rate Elements		Sum of Col. O								
Transfer	0 6 9	rtal TY 2012-	2013 Expected !	Maximum Eligible Re	r Intersional intrastato Access Service Revenue recovery		Sum of Col. R								
Transferred   Properties   Pr	11 2														
Comparison   Com	_								FY 2011 Intrastate Units:						
Companies   Comp									Terminating for Non-	1			<u> </u>	state	
Transferred   December   Part   Par									Originating	Price-Out	Price-Out		- 2	th that the same of the same o	
Control of the impact   Impa	_		Interstate		for Transitional	Unit of	12729/2011	12/28/2011	Terminating for Dedicated R	12/29/2011	12/29/2011 50:	% of Price 771		2011	
Thereford 1  There				USOC		MOU or DS1)	Intrastate Rate	interstate Rate	Elements	2011 Units	ZO11 Units D	ifference intras		nits	
Transport			1		:								H		
### Access  ### Ac	9 1	1		1	Terminating Carrier Common Line					-	-	-			
### Control	2 8	T	-							0	6	0	-		
### CACESS  ### CA	2									0	0	0		0	
## Access  ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Acc	9 5		-	1						0	0	0 0		0	
### Access  ### Ac	7				Terminating Local Switching										
### ACCESS  ### AC	W 4		+	1						0	0	0	-	0	
### Access  ### Ac	15									0	0	0		0	
## Translock   Company	<u></u>		+	1						0	6	0	+	0	
Transport	+		+		Terminating Other (e.g., Information surchange, Transport or Residual							-			
Transport	<b>8</b> 0			1	Interconnection Charges)					-	-	c	+		
## Access  ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Acc										0	0	0		0	
## Access  ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Access ## Acc	1									0	0 0	0	+	0	
SERVICE **  1  1  1  1  1  1  1  1  1  1  1  1	1		+							0	0	0		0.0	
Transport	1_				** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **										
Transport	10 11	1	+	1	Terminating Tandem-Switched Common Itansport					-	6	-	+		
FT ACCESS	1		-							0	0	0		0	
Transport										8	0	0	+	0	
Fit ACCESS  Fit AC	6 0		+							0		0	-	0	
Transport	1				Terminating Tandem Switching										
Transport	2									0	0	0		0	
Transport	m 4		+	1					1	5 6	0 0	5 6	+		
Transport	150									0	0	0		0	
Transport	φ			1						•	ö	٥	+	0	
Transport C C C C C C C C C C C C C C C C C C C					** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **				-						
Transport  1	- m				Originating and Terminating Entrance Facilities					٥	0	0		0	
Tamaport  Tamapo	0 9									0	0	0	+	0	
Transport	2 12	1	+							0	0	0	$\frac{1}{1}$		
201 C	12									0	0	0		0	
	Ω 5			ľ	Orderington and Termination Tandom Sudehad Pudinshad Tennerons				1				1		
	1 15			Ī						0	0	0	+	0	
	· ω		+							0	0	0		0	
	-									o	o	0		0	
	00 0									0	0	0	+	0	
	2 0		+		Originative and Terminative Direct-Trimited Transport					5	5		-		
	료									0	0	0		0	
	12									0	0	D		0	
	E 2								l	0 0	0	0 0		0	
0 0	55.									0	0	0		0	
0	·g														
99 (Vote 1; Enter one rate element per line under the relevant category, Insert rows as necessary.	<u>⊬</u> !2 8	T T							_	0	6	٥	ل	0	
O Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.	2 2														
	晑	ote 1: Enter	one rate eleme	ent per line	s under the relevant category. Insert rows as necessary.										

4 1	• •	) ( )						1 1 1	. ,		1 1 1	1 ( ) 1	1 + +		اد
s s	<b>₩</b> ₩		<b>и и и</b>	w w w w	w w	***	<b>9</b> 9	w w w	w w	w w w	<b>ө ө ө</b>	***	w w w	<b>ශගශගගග</b> ගග	
• •				1 1 1 1	1 1						1 1 1				
<b>м</b> м	60 es	<b>өө</b>	s s s	***	99	***	<b>м м</b>		99	w w w	<b></b>	****	w w w	<b>~~~~~~~~~</b>	
<b>м</b> м	w w w	0 W W	s s s	<b>99999</b>	s s	w w w	w w	w es es	<b>44 44</b>	***	w w w	***	60 KB KB		
			+ 1 1	1 1 1 1 1								1 1 1 1			
														,	
<b>49</b> 49			999	****	<b>.</b> .		<b>99</b>		. ,						
			***				9 9	<b>.</b>			, , ,		, , ,		
,	-	•				•									
<b>69 69</b>		w w w	<b>.</b>		•• ••	***	<b>6</b> 1 61		* *		<i>4</i> 49 49	***	<i>(</i> 1	<b></b>	
	-														
							-								_
	0.000000		000000	0.00000 0.00000 0.00000 0.00000		1 1 1 1	1.1								
	2 2 2	***	s s g	* * * * *	60 60	w w w	s s	***	<b>49</b> 49	<b></b>	w w w	w w w w	w w w	***	
\$0.000000	000000		000000	000000000000000000000000000000000000000			٠.		1 1		1 1 1	* * * 1			
\$0.0 \$0.0	\$0.0 \$0.0 \$0.0	6 6 6	s s 000	8 80.0 80.0 80.0 80.0	<b>69</b> 69	9 49 49	99								
								<i>0, 0, 0, 0</i>	44 44	***	49 49 49		<b>м м м</b>	<b>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</b>	
				‡ }-					44 44	***	<b></b>	<b>69 69 69</b>	<b>м м</b> м	<i>.</i>	
	‡ <b>≻</b>		3RY <b></b>	TEGORY **		£0.			<b></b>	<b>өөө</b>	<i></i>	<b>6</b> 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	иии	<b></b>	
<b>!</b> .,	JEGORY **		CATEGORY **	NCE CATEGORY **		NO TO THE DIMENT OF THE PROPERTY OF THE PROPER		TCHED**			<b>\$</b>	<i></i>	<b>19 19 19</b>		
ON LINE **	MCE CATEGORY ** TING	RING	PORT CATEGORY **	tT SERVICE CATEGORY ™ G		insity Zone		TCHED**						A Ji su	
COMMON LINE **	IG SERVICE CATEGORY ** RMINATING VATING	RECURKING INGEMENT IC	TRUNK PORT CATEGORY **	ANSPORT SERVICE CATEGORY ** G NG IG INATING		E CATEGORY SWITCHED**  - NonDensity Zone	RECURNING TRUNK	TCHED**						A Ji su	
ARRIER COMMON LINE ** 3	MTCHING SERVICE CATEGORY ** REM TERMINATING TERMINATING TTERMINATING	NONRECURRING ARGE REARRANGEMENT FEAT, NRC	TCHING TRUNK PORT CATEGORY ** **ORTS** RMINATING	HED TRANSPORT SERVICE CATEGORY "MINATING SMINATING MINATING MINATING IX TERMINATING	TS TS	SERVICE CATEGORY SWITCHED** 3. DITTER NonDensity Zone 4. WHRE 5. S.	NONRECURING JRC JNE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	ty.
" CARRIER COMMON LINE " INATING MINATING	OCAL SWITCHING SERVICE CATEGORY ** 3(LS1) PREM TERMINATING 1(LS2) PREM TERMINATING NPREM TERMINATING	ON CHARGE INDEM REARRANGEMENT 1 OPT, FEAT, NRC	*AL SWITCHING TRUNK PORT CATEGORY ** RUNK PORTS RUNK PORTS *ORT TERMINATING	SWITCHED TRANSPORT SERVICE CATEGORY "  I. TERMINATING  I.TY TERMINATING  VG TERMINATING  OFT MIX TERMINATING  DS1	NK PORTS NK PORTS	WORLD SERVICE CATEGORY SWITCHED** VG OTTAFF NonDensity Zone VGC Z-WIRE ONCE AAWRE D. VOICE MILE - VOICE	NONRECONKING OICE NRC L PER LINE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	'F Density
** CARRIER COMMON LINE **  - TERMINATING  A - TERMINATING	"LOCAL SWITCHING SERVICE CATEGORY "TITCHING(LSI) PREM TERMINATING ITCHING(LS2) PREM TERMINATING VALLS) NPREM TERMINATING	NONRECURRING NVERSION CHARGE E TO TANDEM REARRANGEMENT TCHING OPT. FEAT. NRC	"LOCAL SWITCHING TRUNK PORT CATEGORY" FFICE TRUNK PORTS FFICE TRUNK PORTS RUNK PORT TERMINATING	ANDEM SWITCHED TRANSPORT SERVICE CATEGORY " W TERM, TERMINATING W FACULITY TERMINATING WITCHING TERMINATING SS3 TO DS1	EM TRUNK PORTS 3M TRUNK PORTS	- VGWATS SERVICE CATEGORY SWITCHED**  OF DOTTER NonDensity Zone SLITY - VOICE 2-WRE SLITY - VOICE 4-WRE SWK FIXED - VOICE WR FIXED - VOICE WR FIXED - VOICE	NDNRECURRING ILITY - VOICE NRC INSTALL PER LINE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	12 DTT/EF Density
"CARRIER COMMON LINE". PREM - TERMINATING NPREM - TERMINATING	"LOCAL SWITCHING SERVICE CATEGORY"  AL SWITCHINGLES) PREM TERMINATING ASTITCHINGLES) PREM TERMINATING NSTITONALLS) WPREM TERMINATING	NONHECUNKING  JORFICE TO TANDEM REARRANGEMENT  AL SWITCHING OPT, FEAT, NRC	"LOCAL SWITCHING TRUNK PORT CATEGORY " ) END OFFICE TRUNK PORTS I END OFFICE TRUNK PORTS MMON TRUNK PORT TERMINATING	"TANDEM SWITCHED TRANSPORT SERVICE CATEGORY " UDEM SWY TERM. TERMINATING UDEM SWY FACULTY TERMINATING MAD SWITCHING TERMINATING MADY TRANSPORT MUX TERMINATING ) MUX-DS3 TO DS1	3 TANDEM TRUNK PORTS I TANDEM TRUNK PORTS	- VOWATS SERVICE CATEGORY SWITCHED** OVE OF OTHER NonDensity Zone RE FACILITY - VOICE 4-WIRE ECT TRANF EXED - VOICE ECT TRANF PIEC - VOICE	NONKELUKNING NOOF NEC TRSPT INSTALL PER LINE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	UPoint 12 DTT/EF Density
" CAL PREM . TERMINATING CCL NPREM . TERMINATING	"LOCAL SWITCHING SERVICE CATEGORY" LOCAL SWITCHINGLS) PERB I TERMINATING LOCAL SWITCHINGLS) PERB I TERMINATING TRANSITIONALLS) NPREM TERMINATING	NONTECHRING TRUNK CONVERSION CHARGE END OFFICE TO TANDEM REARRANGEMENT LOCAL SWITCHING OPT. FEAT. NRC	"LOCAL SWITCHING TRUNK PORT CATEGORY "DS0 END OFFICE TRUNK PORTS DS1 END OFFICE TRUNK PORTS COMMON TRUNK PORT TERMINATING	"TANDEM SWITCHED TRANSPORT SERVICE CATEGORY" TANDEM SW FACLITY TERMINATING TANDEM SWTCHING TERMINATING COMMON TRANSPORT MIX TERMINATING DED MUX-DS3 TO DS1	DS0 TANDEM TRUNK PORTS DS1 TANDEM TRUNK PORTS	" VGWATS SERVICE CATEGORY SWITCHED"  VO DTIFFE NonDensity Zone ENTR. FACILITY VOICE 3-WIRE DIRECT TRAIK FIXED VOICE DIRECT TRAIK FIXED VOICE DIRECT TRAIK PER MILE - VOICE	ENTR. FACILITY - VOICE INC SW TRSPT INSTALL PER LINE OR TRUNK	TCHED**	DS1 NONRECURRING - SWITCHED \$ ENTR. FACILITY - DS1 NRC MUX - DS1 TO VOICE NRC \$		ENTR. FACILITY - DS3 NRC ENTR. FACILITY - DS3 W/TERM EQIP REARR \$ MUX - DS3 TO DS1 NRC \$		ENTR FACILITY - STS1 NRC ENTR FACILITY - STS1 WITERM EQIP REARR MUX - STS1 TO DS1 NRC \$		OptiPoint 12 DTT/EF Density
" CARBER COMMON LINE " CCL PREM - TERMINATING CCL NPREM - TERMINATING	"LOCAL SWITCHING SERVICE CATEGORY" LOCAL SWITCHINGLES PREM TERMINATING LOCAL SWITCHINGLES PREM TERMINATING TRANSITIONALLES) WPREM TERMINATING	TRUNK CONVERSION CHARGE END OFFICE TO TANDEM REARRANGEMENT LOCAL SWITCHING OPT. FEAT. NRC	"LOCAL SWITCHING TRUNK PORT CATEGORY "DS0 END OFFICE TRUNK PORTS DS1 END OFFICE TRUNK PORTS COMMON TRUNK PORT TERMINATING	** TANDEM SWITCHED TRANSPORT SERVICE CATEGORY ** TANDEM SWY TERM TERMINATING TANDEM SWY TERMINATING TANDEM SWYTCHING TERMINATING COMMON TRANSPORT MUX TERMINATING DED. MUX-DS3 TO DS1	DSD TANDEM TRUNK PORTS DS1 TANDEM TRUNK PORTS	* VOWNATS SERVICE CATEGORY SWITCHED**  VO BOTHER NonDensely Zone ENTR. FACILITY - VOICE 4-WRE DRECT TRINK FISE. VOICE  DRECT TRINK PER MILE - VOICE	ENTR FACILITY - VOICE INC SW TRSPT INSTALL PER LINE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	OptiPoint 12 DTT/EF Density
** CALPREM - TERMINATING CCL NPREM - TERMINATING	"LOCAL SWITCHING SERVICE CATEGORY"  LOCAL SWITCHINGLS) PREM TERMINATING  LOCAL SWITCHINGLS) PREM TERMINATING  TRANSITIONALLS) MPREM TERMINATING	TRUNK CONVERSION CHARGE END OFFICE TO TANDEM REARRANGEMENT LOCAL SWITCHING OPT. FEAT. NRC	"LOCAL SWITCHING TRUNK PORT CATEGORY " DS0 END OFFICE TRUNK PORTS DS1 END OFFICE TRUNK PORTS COMMON TRUNK PORT TERMINATING	** TANDEM SWITCHED TRANSPORT SERVICE CATEGORY ** TANDEM SW FACLITY TERMINATING TANDEM SWITCHING TERMINATING COMMON TRANSPORT MLX TERMINATING DED. MUX-DS3 TO DS1	DSD TANDEM TRUNK PORTS DS1 TANDEM TRUNK PORTS	ENTR. FACILI ENTR. FACILI DIRECT TRNI DIRECT TRNI	NONECURING ENTER FACILITY - VOICE NRC SW TRSPT INSTALL PER LINE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	OptiPoint 12 DTT/EF Density
		TRUNK CONVERSION CHAR END OFFICE TO TANDEM RE LOCAL SWITCHING OPT. FE				ENTR. FACILI ENTR FACILI DIRECT TRAIN DIRECT TRAIN		" HIGH CAP & DDS SERVICE CATEGORY SWITCHED- DS1, DTT/FF ENTR FAC. DS1 DRECT TRWK FKED. DS1 DIRECT TRWK PER MILE - DS1 MIX. DS1 TO VOICE	DS1 NONRECURRING - SWITCHED ENTR. FACILITY - DS1 NRC MUX - DS1 TO VOICE NRC	DS3, DT/FF ENTR FAC. DS3 DRECT TRWK FAKED - DS3 DRECT TRWK PER MILE - DS3 MUX - DS3 TO DS1	ENTR FACILITY - DS3 NRC ENTR, FACILITY - DS3 W/ TERM EQIP REARR MUX - DS3 TO DS1 NRC	STS1, DTT/EF  DIRECT TRINK FAKED. STS1  DIRECT TRINK PER MILE - STS1  MUX. STS1 TO DS1	ENTR FACILITY - STS1 NRC ENTR FACILITY - STS1 WITERM EQIP REARR MUX - STS1 TO DS1 NRC	OptiPoint's Entire Facusia OptiPoint's Direct Traunk Fixed OptiPoint's Direct Traunk Fixed OptiPoint's Conficial Fixed NILE OPTIPOINT'S CONFIGURATION NODE OPTIPOINT'S CONFIGURATION CARDASTS OPTIPOINT'S CONFIGURATION CARDAST OPTIPOINT'S CONFIGURATION CARDAST OPTIPOINT'S CONFIGURATION CARDASTS	OptiPoint 12 DTT/EF Density
XX.A CCL PREM - TERMINATING XX.A CCL NPER - TERMINATING XX.A CCL NPREM - TERMINATING	* LOCAL SWITCHING SERVICE CATEGORY *  XXA LOCAL SWITCHINGLS!) PREM TERRINATING  XXA LOCAL SWITCHINGLS!) PREM TERRINATING  XXA TRANSITIONALLS!) NPREM TERRINATING	X.X.A TRUNK CONVERSION CHARGE X.X.A END OFFICE TO TANDEM FEARRANGEMENT X.X.A LOCAL SWITCHING OPT. FEAT. NRC	**LOCAL SMITCHING TRUNK PORT CATEGORY **  X.X.A DSI END OFFICE TRUNK PORT'S  X.X.A COMMON TRUNK PORT TERMINATING  X.X.A COMMON TRUNK PORT TERMINATING	XXA TANDEM SWITCHED TRANSPORT SERVICE CATEGORY **  XXA TANDEM SW FACILITY TERMINATING  XXA TANDEM SWY FACILITY TERMINATING  XXA COMMON TRANSPORT MIX TERMINATING  XXA COMMON TRANSPORT MIX TERMINATING  XXA DED MUX-DS3 TO DS1	X.X.A DSD TANDEM TRUNK PORTS X.X.A DS1 TANDEM TRUNK PORTS	ENTR. FACILI ENTR. FACILI DIRECT TRNI DIRECT TRNI	X.X.A EUTR. FACILITY - VOICE NIC X.X.A SW TRSPT INSTALL PER LINE OR TRUNK	TCHED**		sa, ditvef		1S1, DTTEF		A Ji su	OptiPoint 12 DTT/EF Density
		TRUNK CONVERSION CHAR END OFFICE TO TANDEM RE LOCAL SWITCHING OPT. FE				ENTR. FACILI ENTR FACILI DIRECT TRAIN DIRECT TRAIN		" HIGH CAP & DDS SERVICE CATEGORY SWITCHED- DS1, DTT/FF ENTR FAC. DS1 DRECT TRWK FKED. DS1 DIRECT TRWK PER MILE - DS1 MIX. DS1 TO VOICE	DS1 NONRECURRING - SWITCHED ENTR. FACILITY - DS1 NRC MUX - DS1 TO VOICE NRC	DS3, DT/FF ENTR FAC. DS3 DRECT TRWK FAKED - DS3 DRECT TRWK PER MILE - DS3 MUX - DS3 TO DS1	ENTR FACILITY - DS3 NRC ENTR, FACILITY - DS3 W/ TERM EQIP REARR MUX - DS3 TO DS1 NRC	STS1, DTT/EF  DIRECT TRINK FAKED. STS1  DIRECT TRINK PER MILE - STS1  MUX. STS1 TO DS1	ENTR FACILITY - STS1 NRC ENTR FACILITY - STS1 WITERM EQIP REARR MUX - STS1 TO DS1 NRC	OptiPoint's Entire Facusia OptiPoint's Direct Traunk Fixed OptiPoint's Direct Traunk Fixed OptiPoint's Conficial Fixed NILE OPTIPOINT'S CONFIGURATION NODE OPTIPOINT'S CONFIGURATION CARDASTS OPTIPOINT'S CONFIGURATION CARDAST OPTIPOINT'S CONFIGURATION CARDAST OPTIPOINT'S CONFIGURATION CARDASTS	OptiPoint 12 DTT/EF Density

	140		
			111
<b>~~~~~~~</b>		<b>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</b>	<b>ө ө ө</b>
<b></b>		<b>мимимимим</b> м	
, ,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	<b>~~~~~~~~~</b>	<b>" " » » » » » » » » » »</b>	
			• •   •
<b>~~~~~~~~~</b>	••••••		
			1 , 4 .
**********	<i></i>	<b></b>	w w w
		.=	
•			
	,		w w w
	, , , , , , , , , , , , ,		(n (n (n
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<b></b>	<b></b>	(O (O (O
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	3 SEQUIV	
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54		3 SEQUIV	
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	nsation Equivalent Interstate rate Detail
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	venue Revenue I Compensation Equivalent Interstate rate Detail Mux
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	venue Revenue I Compensation Equivalent Interstate rate Detail Mux
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	venue Revenue I Compensation Equivalent Interstate rate Detail Mux
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	venue Revenue I Compensation Equivalent Interstate rate Detail Mux
751 8.53 8.53 7.73 7.73 8.54 8.54 8.54 8.54 8.54 8.54 8.54 8.54	LLE	3 SEQUIV	venue Revenue I Compensation Equivalent Interstate rate Detail Mux

-	-					-	-	-	-	,	-	֓֞֜֞֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֡֓֓֡֓֓֡֓֓֓֡֓		٥	6	•	
1 Filing Date:	<u>.</u> برید	ار				,	-			<u> </u>			<u>}</u>		,		,
3 Transmitt 4 COSA:	Transmittal Number: COSA:																
.s vo																	
7 Total FY 2	011 Actual Rev	renue for Tran	nsitional Intrastate Access Service Rate Elements for Transitional Interaction Access Consider Data Elements		Sum of Col. 0	0 0											
9 Total TY 2	012-2013 Exper	cted Maximul	JOSE 11 JOSE 11 LOSA TOMBRES REPORTED TO TRANSPORTED THE SECOND STATES THE PROPERTY OF THE TRANSPORTED THE SECOND STATES AND THE SEC		Sum of Col. R	00											
11																	
							FY 2011 Intrastate Units: Terminating for Non-	intrastate Price-Out	Interstate		# E	rastate ce-Out					77 2012-
Intrastate	Interstate te Tariff Fion Section	9	ts for Transitional	Unit of Demand (e.g.,	12/29/2011 Intrastate Rate	12/29/2011 Interstate	Originating and Terminating for Dedicated Elements	With 12/29/2011 Rates and FY 2011 R. Units	Price-Out with 12/29/2011 50% Rates and FY 2011 Units Dif	50% of Price Pro Out Int	7/1/2012 Pro	With Proposed Rates and intra FY 2011 Price Units Diffe	FY 2011 Intrastate Actual Price-Out Intrastate Difference Revenue	al 2011 Actual ate Intrastate inte Revenue	TY 2012-	2013 Expected Maximum Intrastate Revenue	2013 Intrastate Eligible Recovery
14 Input		++		Input	Indu		Input	Ŧ	G*H		++		++			ς <u>,</u>	P.
15 16		_	** TERMINATING END OFFICE ACCESS SERVICE ** Terminating Carrier Common Line						+	-	-		-				
17								0	0	0	+	0	0		00	0	0 0
19								0	0	0		0			20		0
20								00	•	0		00	00	+	00	00	00
22			Terminating Local Switching							-					-		
24	_							0	0	0		0	0		0 0	0	0
25								0	00	0		0	00		00	0	0
27								0	0	0		0	0		, 0	0	0
28			Terminating Other (e.g., information surcharge, Transport or Residual Interconnection Charges)														
52								0 0	0 0	0 0		0 0	0 0		0 0	0 0	0 0
31								6	0	0		0	0		0		0
32	+							00	0	•		0 0	0 0		00	0	0 0
34			** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **					$\prod$									
38	+		Terminating Tandem-Switched Common Transport					0	0	0		0	0		0	0	0
37								0	0	0		0	0		0	٥	0
39								6 6	0 0	0 0		0 0	0 0		00	0	0
40								0	0	0		0	0		0	0	O
42	+	-	Terminating Tandem Switching					•	0	0		0	0		0	0	0
43								0	0	0		0 0	0		00	0 (	0
45								0	0	0		0	0		0	0	0
46							$\dagger$	<u></u>	•	0		0	-	+	0	•	0
47			** ORIGINATING AND LEKMINATING DEDICATED TRANSPORT ACCESS SERVICE **														
48			Originating and Terminating Entrance Facilities					0 0	0 0	0 0		0 0	0 0		0 0	6	0 0
202								0	0	0		0	0		, 0		0
52								0	0	0		00	0 0		00	5 0	0 0
83																	
55		_	Originating and Terminating Tandem-Switched Dedicated Transport					10	0	•		0	0		0	•	0
98								0	0	0		0	0		0	0	0
28 82	-							0	0	0 0		0 0	0 0		00	00	0 0
29			65					0	0	0		0	0		o	0	Ö
9 19	-		Originating and Terminating Direct-Trunked Transport					0	•	0	+	0	0	-	0	•	°
62								0	0	0		0	0		0	0	٥
69	+							0	0	00	-	0 0	0 0	-	00	0 0	0 0
65	$\prod$							0	0	0		0	0		0	0	0
9 (9							_		0	6	L	0	0	0	[°	0	٥
89							j				J				1		
70 Note 1: E	nter one rate el	Hernent per lin	ne under the relevant category. Insert rows as necessary.														•
			ווב מומבן נוב רייב בייני														

									٠.	2 1 6 1		, , ,			
							69 KG	***	<b>∞</b> •	<i>••••••</i>		10 10 10 10			
, ,			69 69 69 , , ,	*****					* '		, , ,				
•• ••	es es	8 8 8	* * *	***	s s	w w w	s s	8 8 8 8	••	w w w	w w w	***	W W W	<i></i>	
				1111				1 1 1 +	2.1						
99	<b>ч</b> ч ч	0 v v	***	***	9 9	***	<b>9</b> 9	<b>66 66 66</b>	**	***	* * *	***	***	<b>,,,,,,,,,,,</b>	
1 1				1 1 1 1 1		1 1 1 1	٠.		* 1	1 1 1 1					
8 8			w w w	<b>99999</b>	s s		s s		<b>5</b> 5			***			
								1 + + 1							
<b>~ ~</b>	w w w	<b></b>	w w w	***	es es		o o	***	s s	w w w w	**	<b>~~~</b>		<b></b>	
							, ,				1.1.1				
							.aa		<b>5</b> 5						
			<i>s</i>												
<b>\$</b>	999	s s s	***	<b>~~~~</b>	es es	***	es es		<b>60</b> 60	***	***	w w w	<b>69 69</b>	<b></b>	
	,			, , , , ,	, ,										
	000		00	0000											
	\$0.000000 \$0.0000000 \$0.0000000		\$0.000000	\$0.000000 \$0.0000000 \$0.000000000000000	w w		es es	***		***			w w w	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
0000				0000					٠.						
\$0.000000	\$0.000000 \$0.000000 \$0.000000	w w w	\$0.000000	\$0.00000 \$0.000000 \$0.000000 \$0.000000	<b>↔</b> ↔	***	<b>49</b> 49		<b>55</b> 55		w w w	w w w w		<b></b>	
				жү **				Ł							
	¥ :		"LOCAL SWITCHING TRUNK PORT CATEGORY": FRICE TRUNK PORTS FRICE TRUNK PORTS RUNK PORT TERMINATING	"TANDEM SWITCHED TRANSPORT SERVICE CATEGORY" TANDEM SWI TERM. TERMINATING TANDEM SWITCHEN TERMINATING COMMON TRANSPORT MICK TERMINATING DED MUX-DS3 TO DS1		# CEP		" HIGH CAP & DDS SERVICE CATEGORY SWITCHED" C.DS1 RNK-FIXED. DS1 RNK-FIXED. DS1 TO VOICE							
i.	NTEGO		CATEG	VICE C		SWITCI		RY SW	CHED					Ą	
** CARRIER COMMON LINE *** TING IATING	" LOCAL SWITCHING SERVICE CATEGORY " LOCAL SWITCHINGLES) PREM TERMINATING LOCAL SWITCHINGLES) PREM TERMINATING TRANSITIONAL(LS) NPREM TERMINATING		PORT	S T SER		" VGWATS SERVICE CATEGORY SWITCHED" VO TOTTEE NonDersity Zone ENTR FACILITY - VOICE 2-WIRE DIRECT TRINK FIXED - VOICE DIRECT TRINK FIXED - VOICE	D N	TEGO F	DS1 NONRECURRING - SWITCHED ENTR. FACILITY - DS1 NRC MUX - DS1 TO VOICE NRC	ь.	8	ь	AR.	OptiPoint 3 DT/REF Density USS DS3 USWIF FIXED RATION NODE RATION CARD-STS1 RATION CARD-DS1 RATION CARD-DS3 RATION CARD-DS3 RATION CARD-DS3 RATION CARD-DS3 RATION CARD-DS3 RATION CARD-SS3	
COMINC	S SERV SMINAT SMINAT SMINAT	NONKECORRING GE SARRANGEMENT AT, NRC	RUNK	USPOR 16 3 INATIN		CATE	NONRECURRING C E OR TRUNK	DTT/E	RRING	DS3, DTTÆF	IP REA	STS1, DIT/REF	P RE	DTT/E	
RRER	CHING EM TER ERMIN	ARRAN	HING T RTS RTS MINATI	D TRAN MATING MATING TERMI		RWICE TT/EF MRE MRE	NONE C E OR T	DS1,	VRECU	8 8	₹M EQ	STS	E E	FIXED PER NO NO NO CAF	
- CAR TING ATING	L SWIT (1) PRE (2) PRE REM T	CHARG EM RE	SWITCH NK POI NK POI	TCHEC ERMIN TERMITERMITERMITERMITERMITERMITERMITERMI	PORTS	VG D VG D VG E VG E VOICE	ER LIN	& DDS DS1 E - DS	S1 NO	DS3 .E.DS	NRC W TE	STS1 LE-ST	NRC W TE	Optil C-DS3 FRUNK FRUNK FRUNK FRATIC URATIC URATIC	in a
RMINA	LOCA ING(LS ING(LS LS) NP	TAND ING OF	DCAL: E TRU E TRU K POR	EM SWI ERM. T CCLLTY CCLLTY CHING SPION TO DS	SCNK.	VG/W/ VOIC VOIC IXED	VOIC	H CAP	DS1	3 IXED - FER MII	- DS3	S1 IXED - PER MII	- STS - STS DS: 1	TR FA RECT 1 ONFIG ONFIG ONFIG ONFIG	THE
M-TE	WITCH WITCH IONAL	CONVE TCE TC	OFFIC OFFIC	TANDI SW TE SW F/ SWITC V TRAN	DEM T	ACILITA TRNK F	ACILITY PT INS	* HIG ACDS TRNK P TRNK P	CLIT 1 TO 1	ACDS TRNK F TRNK F	CLUD CLUD S3 TO E	ACST. TRNK F TRNK F	ACILITY ACILITY IS1 TO	MT3-EN MT3-DI MT3-C MT3-C MT3-C MT3-C MT3-C	4 4 2 13
** CAR CCL PREM - TERMINATING CCL NPREM - TERMINATING	CAL S CAL S SANSIT	TRUNK CONVERSION CHANGE END OFFICE TO TANDEM REARRANGEMENT LOCAL SWITCHING OPT. FEAT. NRC	** LOCAL SWITCHING TRUN DSD END OFFICE TRUNK PORT'S DS1 END OFFICE TRUNK PORT'S COMMON TRUNK PORT TERMINATING	"TANDEM SWITCHED TRANSPORT TANDEM SW TERM TERMINATING TANDEM SW FACILITY TERMINATING TANDEM SWITCHING TERMINATING COMMON TRANSPORT MUX TERMINATING DED. MUX-DS3 TO DS1	DS0 TANDEM TRUNK PORTS DS1 TANDEM TRUNK PORTS	YTR FY	NONRECURF ENTR. FACILITY - VOICE NRC SW TRSPT INSTALL PER LINE OR TRUNK	"HIGH CAP & DDS SE DIRECT TRNK FXED - DS1 DIRECT TRNK FXED - DS1 DIRECT TRNK FER MILE - DS1 MUX - DS1 TO VOICE	VTR F	ENTR. FACDS3 DRECT TRNK FIXED - DS3 DIRECT TRNK PER MILE - DS3 MUX - DS3 TO DS1	ENTR. FACILITY - DS3 NRC ENTR. FACILITY - DS3 W/ TERM EQIP REARR MUX - DS3 TO DS1 NRC	S ENTR FAC.STS1 DIRECT TRNK FIXED - STS1 DIRECT TRNK PER MILE - STS1 MUX - STS1 TO DS1	ENTR. FACILITY - STS1 NRC ENTR. FACILITY - STS1 W/ TERM EQIP REARR MUX - STS1 TO DS1 NRC	OPIPOINT3-ENTR FAC.033 OPTPOINT3-ENTR FAC.033 OPTPOINT3-DRECT TRUNK FRED OPTPOINT3-DRECT TRUNK PER MILE OPTPOINT3-CONFIGURATION NODE OPTPOINT3-CONFIGURATION CARD-DS1 OPTPOINT3-CONFIGURATION CARD-DS3 OPTPOINT3-CONFIGURATION CARD-DS3 OPTPOINT3-CONFIGURATION CARD-DS3 OPTPOINT3-CONFIGURATION CARD-DS3 OPTPOINT3-CONFIGURATION CARD-CS3 OPTPOINT3-CONFIGURATION CARD-CS3	Ontiboint 12 DTT/FE D
88	334	# 6 2	888	2225	ăă	مَ مَ شَ شَ	ចែស	ធី គី គី គី	ធ្ន	ತ್ರಬಹ	ພົພີຂັ	<u> </u>	בֿ שֿ שֿ	000000000	Č
e 4					4 4	444	44	4444	4 4	4444		4444			
X X X X X X							7.7								
××	X X X 4 X X 4 4 4	X X X X X X A A A	X X X X X X X X X	X	X X X X X X X X X X X X X X X X X X X	X X X X X X X X X X X X X X X X X X X	X X X X X X X X X X X X X X X X X X X	X X X X X X X X X X X X X X X X X X X	XX-X-X-A	X X X X X X X X X X X X X X X X X X X	X X X X X X X A A	X X X X X X X X X X X X X X X X X X X	X X X A A X	*****	
××	XXX AXX AXX	<u> </u>	***	****	Χ̈́Χ	***	ΧX	****	χχ	****	***	\$\$\$\$	***	*******	
× × × × × × × × × × × × × × × × × × ×	XXA XXA XXA XXA XXA	XXA XXA	XXA XXA XXA XXA	XXXA XXA XXA XXA XXA XXA XXA	XXA XX	**** **** **** ***	XXA XX	***** ***** ****	XXA XX.	XXA XXA XXA XXA XXA XXA	XXA XXA XXA XXA	XXA XXA XXX XXX	XXA XX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	

<b></b>	***		м ммм <del>ммм</del>
<b>~~~~~~~~</b>			w w w w w
			,
<b></b>	*******		4
***********		*********	
***	<b></b>	<b></b>	· • • • • •
	<b></b>		<b>м</b> мммм
****	<i></i>	<i></i>	<b>м</b> мммм
			, , ,
			1 1
***	**********		<b>~ ~ ~</b>
		( ) ) ) ( ) ( ) (	
<b></b>	**********	***	
			<u> </u>
		÷ ≥	Revenue 1 Switched Revenue 1 Switched Revenue Reciprocal Compensation <u>Equivalent Interstate rate Detail</u> 9 with PortMux 9 witching 9 witching
		EMERATION CHARGE BERATION CHARGE ENERATION CHARGE INC TICAL SERVICE CHARGE TICAL SERVICE CHARGE INC TI	ter stat
57 12 18 18 18 18 18 18 18 18 18 18 18 18 18	TS1 S3 C3 C12 C12C	Zone S S1 OR [ E-NR SE-NR SE-NR	alent in
ED AMILE AMDE AMD-DS AMD-DS AMD-OS AMD-OS AMD-OS	ED AMILE ARD-S ARD-D ARD-O ARD-O ARD-O ARD-O	Density ARGE TARGE TARGE TARGE TARGE CHARGE CHARGE TO THARGE	) Equiv
NK PEX NK PEX NK PER NK PER NT NC NT	SS NK FIXE NK PER NK PER NTION N TION C TION C TION C	A Non- ON CH ON CH TION CH TION CH TION CH TION CH TION CH TION CH TION CH TION CH TION CH	nsatio
FAC-D: TTRUI TTRUI TIGURA TIGURA TIGURA TIGURA	Densit FAC-D: T TRUI T TRUI TIGURA TIGURA TIGURA TIGURA	pdPoin WERATI WERATI WERATI WERATI WERATI WERATI WERATI WERATI	venue Seenue Logipse Fux
OPTIONITIZENTE FAC-053 OPTIONITIZABRECT TRUMK FAED OPTIONITIZABRECT TRUMK FAED OPTIONITIZABRECT TRUMK PER MILE OPTIONITIZA COMPIGUATION MODES OPTIONITIZA COMPIGUATION CARD-051 OPTIONITIZA COMPIGUATION CARD-053	Opel out 48 DTIFE Density Opel Ontar 44 DTIFE Density OPTIONIT44-BIRECT TRUNK EPER MILE OPTIONIT44-BIRECT TRUNK EFER MILE OPTIONIT44-BIRECT TRUNK EFER MILE OPTIONIT45. CONFIGURATION NODE OPTIONIT45. CONFIGURATION CARD. DS3 OPTIONIT45. CONFIGURATION CARD. DS3 OPTIONIT45. CONFIGURATION CARD. DS3 OPTIONIT45. CONFIGURATION CARD. OCT. OPTIONIT48. CONFIGURATION CARD. OCT. OPTIONIT48. CONFIGURATION CARD. OCT. OPTIONIT48. CONFIGURATION CARD. OCT.	Optipolint's REGENERATION CHARGE OPTIPOLINT'S OPTIPOLIS SERVICE CHARGE - NRC OPTIPOLIT'S - OPTICAL SERVICE CHARGE - NRC OPTIPOLIT'S - OPTICAL SERVICE CHARGE - NRC OPTIPOLIT'S ENTIRE CHARGE - NRC OPTIPOLIT'S ENTIRE CHARGE - NRC OPTIPOLIT'S ENTIRE RECOBS - NRC OPTIPOLIT'S ENTIRE RECORDS - NRC OPTIPOLITY RECORDS - NRC	End Office Revenue Dedicated Switched Revenue Dedicated Switched Revenue Reciprocal Comps End Office with PortMux Tandem Switching Partiem Switching Ports & Mux
OINT12 OINT12 OINT12 OINT12 OINT12 OINT12	oint 48   Oint 48   Oint 46 Oint 46 Oint 46 Oint 46 Oint 48	COINT3-COINT46 COINT46 COINT46 COINT46 COINT46 COINT74	End Office Revenue Tandem Switched Ry Dedicated Switched I Reclinical Reclinical Tandem Switched Tandem Switched Forts & Mux
91190 91190 91190 91190 91190 91190	90407-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0	91790 91790 91790 91790 91790 91790	End O Tande Dedica End Ol Tande Tande
444444444	444444444	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	